

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, *ex  
rel.* JESSE M. POLANSKY, M.D.,  
M.P.H.,

Plaintiff,

v.

GEISINGER HOLY SPIRIT;  
GEISINGER COMMUNITY  
MEDICAL CENTER; GEISINGER  
MEDICAL CENTER; SPIRIT  
PHYSICIAN SERVICES INC.

Defendants.

Civil No. 20-CV-599  
(Judge Conner)

**Unopposed Motion for Extension of Time for  
Relator's Opposition to Defendants' Motion to Dismiss**

Relator respectfully submits this unopposed motion regarding his time to answer Defendants' Motion to Dismiss. In support of this motion, Relator states as follows:

1. Relator completed service of his Complaint on Defendants Geisinger Holy Spirit, Geisinger Community Medical Center, Geisinger Medical Center, and Spirit Physician Services, Inc. on February 12, 2024. ECF Nos. 39–42.
2. Defendants received a sixty (60) day extension to respond to Realtor's Complaint. ECF Nos. 47, 51. Defendants served a motion to dismiss Relator's Complaint on April 8, 2024. ECF No. 69.

3. Relator requested from Defendants' counsel a similar fifty-nine (59) day extension to respond to Defendants' motion. Defendants' counsel has agreed to the requested extension.

4. This is the first extension requested by Relator in this matter and the parties agree that this extension will not cause undue delay or prejudice to any party.

Relator thus requests that the Court grant his unopposed motion and extend his time to respond to Defendants' Motion to Dismiss to June 20, 2024.

Dated: April 12, 2024

/s/ Stephen Shackelford, Jr.

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*Attorneys for Relator*

**Certificate of Concurrence**

I, Nicholas Carullo, certify that I sought the concurrence of counsel for Defendants in the Motion. Defendants' counsel concurs in this Motion.

*/s/ Nicholas C. Carullo*  
Nicholas C. Carullo

Date: April 12, 2024

**Certificate of Service**

I, Nicholas C. Carullo, certify that a true and correct copy of the foregoing Unopposed Motion for Extension of Time was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing by ECF on all counsel of record.

/s/ Nicholas C. Carullo  
Nicholas C. Carullo